

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

AKEEM HENDERSON and JENNIFER
ALEXANDER, INDIVIDUALLY AND
AS ADMINISTRATRIX OF THE
SUCCESSION OF A. H.

(Plaintiffs)

VERSUS

WILLIS-KNIGHTON MEDICAL
CENTER d/b/a WILLIS KNIGHTON
SOUTH HOSPITAL

(Defendant)

CIVIL ACTION NO. 5:19-CV-00163

JUDGE ELIZABETH E. FOOTE

MAGISTRATE JUDGE
MARK L. HORNSBY

**PLAINTIFFS' MOTION TO DISQUALIFY DEFENDANT'S EXPERT JACQUELINE
WHITE, M.D. AND TO STRIKE HER TESTIMONY AS UNRELIABLE**

NOW INTO COURT COME Plaintiffs, Akeem Henderson and Jennifer Alexander, individually and as duly appointed Administratrix of the Succession of her late daughter, A.H., who respectfully move this Honorable Court for an Order disqualifying Jacquelyn White, M.D. as Willis-Knighton's expert in this case and/or striking her testimony as unreliable under Rule 702 of the Federal Rules of Evidence, as more particularly set for below, to-wit:

1.

On January 24, 2020, Defendant, Willis-Knighton identified Jacquelyn White, M.D. as its expert witness in this above styled and numbered cause arising under 42 U.S.C. § 1395dd, the Emergency Medical Treatment and Labor Act or ("EMTALA").

2.

Dr. White's deposition taken February 12, 2020 revealed good grounds for disqualifying her as an expert witness in this case.

3.

The deposition further revealed that Dr. White's opinion is unreliable for the purposes of Rule 702 of the Federal Rules of Evidence because it is not based on fact and her methodology is flawed.

4.

For the reasons more fully set forth in Plaintiffs' memorandum supporting the instant Motion in Limine, Plaintiffs request this Honorable Court disqualify Jacquelyn White, M.D. as an expert in this case and strike her testimony.

WHEREFORE PLAINTIFFS PRAY, after due proceedings had, there be a judgment rendered against Willis-Knighton and in favor of Plaintiffs disqualifying Jacquelyn White, M.D. as an expert witness in this case and striking her testimony.

Respectfully Submitted:

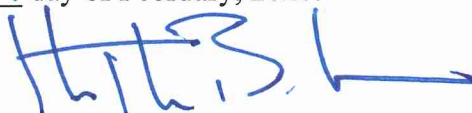


SEDRIC E. BANKS LBN 2730
S. HUTTON BANKS LBN 37377
1038 North Ninth St.
Monroe, Louisiana 71201
318-388-1655 telephone
318-816-5026 facsimile
sedbanks@aol.com

*Attorneys for Akeem Henderson and
Jennifer Alexander*

CERTIFICATE OF SERVICE

The foregoing has been served on opposing counsel electronically via the CM/ECF/PACER system on this 27th day of February, 2020.



S. HUTTON BANKS